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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Lee C. Kamimura, *individually
and on behalf of all others
similarly situated,*

Plaintiff,

V.

Green Tree Services, LLC,

Defendant.

Case No. 2:16-cv-00783-APG-CWH

**DECLARATION OF PLAINTIFF LEE C.
KAMIMURA**

DECLARATION

I, Lee C. Kamimura, declare:

1. I am the plaintiff in this case.
2. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe that they are true and correct.
3. I am submitting this declaration in support of the motion for class certification and motion for summary judgment in this case.
4. I do not remember receiving any communications from Defendant. I never spoke to Defendant on the phone or in writing. I was never offered any financing or other services from Defendant. As far as I know, Defendant never tried to call me or to obtain my address or any other information from me for any legitimate purpose.
5. After I received my bankruptcy discharge, I personally owed Defendant \$0. Defendant also no longer had any lien. Defendant had no business with me.
6. I believe that Defendant repeatedly accessed my private credit reports for no legitimate reason.
7. I am truly upset that people that I have nothing to do with have been looking into my credit reports.
8. When I found out Defendant was accessing my credit reports, I felt that was a huge invasion of my privacy. I believe my feelings on privacy are similar to the ordinary American and I try to protect my privacy. I am generally a private person and don't talk to other people about information in my credit reports. Like most people, I always shred financial documents. Defendant's actions caused me to feel that my privacy has been invaded, I had anxiety and a loss of sleep and appetite. I tried to manage these symptoms caused by Defendant by periodically visiting an acupuncturist and other similar methods.

1 9. Defendant's actions of looking into my credit also made me worry about the
2 possibility of identity theft.

3 10. I have actively participated in the case since before it was filed. I reviewed the
4 pleadings, was involved in litigation, and gave my deposition testimony on June
5 27, 2017. I also frequently make myself available to discuss various matters
6 with my attorneys, including settlement and other issues in my case.

7 11. I understand this case and why it was brought against Green Tree.

8 12. I believe that I adequately represent the other class members.

9 13. There are no conflicts between me and any other class members.

10 14. I am a resident of Clark County, Nevada.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed on
12 March 6, 2018, pursuant to the laws of the United States and the State of Nevada.

13 By: Lee C. Kamimura
14 Lee C. Kamimura